

COREY B. TOLLIVER, OSB NO. 075500
E-mail: corey@FARlawfirm.com
FOLAWN ALTERMAN & RICHARDSON LLP
805 SW Broadway, Suite 2750
Portland, Oregon 97205
Telephone: (503) 546-4620
Facsimile: (503) 517-8204

Attorneys for Defendant-Intervenor NAC Group, Inc.

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

ZELPRO ASSEMBLY SOLUTIONS, LLC ,)	
an Oregon limited liability company, CIRCUIT)	
MANUFACTURING, INC. , an Oregon)	Case No. 3:11-cv-00519-MO
corporation, and CALVIN RASMUSSEN , an)	
individual,)	DEFENDANT-INTERVENOR'S
)	MOTION FOR SUMMARY
Plaintiffs)	JUDGMENT ON FIRST
v.)	COUNTERCLAIM
)	
STINGL PRODUCTS, LLC , a Virginia limited)	
liability company, DAVID STINGL , an)	
individual, and TONY SIRIANNI , an)	Oral Argument Requested
individual,)	
)	
Defendants,)	
)	
NAC GROUP, INC. , a Florida corporation,)	
)	
Defendant-Intervenor.)	

LR 7.1 CERTIFICATION

The undersigned attorney certifies that he attempted in good faith to resolve the subject of this motion through conferral by email and by telephone.

MOTION

Defendant-intervenor NAC Group, Inc., by and through its attorney Corey Tolliver, moves the Court to enter summary judgment in its favor on its first counterclaim for declaratory

Page 1 – DEFENDANT-INTERVENOR'S MOTION FOR SUMMARY JUDGMENT ON
FIRST COUNTERCLAIM

FOLAWN ALTERMAN & RICHARDSON LLP
805 SW Broadway, Suite 2750
Portland, OR 97205
Telephone: (503) 517-8200

judgment against plaintiffs.

This motion is supported by the Memorandum in Support, Declaration of Larry Sherris (in Support of Motion to Intervene) of July 11, 2011 (Docket #17), and Declaration of Corey Tolliver of March 14, 2013, together with supporting exhibits.

DATED this 14th day of March, 2013

FOLAWN ALTERMAN & RICHARDSON LLP

By /s/ Corey B. Tolliver

Corey B. Tolliver, OSB #075500
corey@FARlawfirm.com
Telephone: (503) 546-4620
Facsimile: (503) 517-8204
Attorneys for NAC Group, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2013, I caused to be served a copy of the foregoing DEFENDANT-INTERVENOR'S MOTION FOR SUMMARY JUDGMENT ON FIRST COUNTERCLAIM on the following persons in the manner indicated below at the following address:

Leonard D. DuBoff
lduboff@dubofflaw.com
The DuBoff Law Group LLC
6665 SW Hampton Street, Suite 200
Portland, OR 97223
Telephone: (503) 968-8111
Facsimile: (503) 968-7228

Attorneys for Plaintiffs

Garrett Garfield
Garrett.Garfield@hklaw.com
Holland & Knight LLP
111 SW Fifth Avenue, Suite 2300
Portland, OR 97204
Telephone: (503) 243-2300
Facsimile: (503) 241-8014

Attorneys for Defendant STINGL PRODUCTS, LLC

Christopher C. S. Blattner
csturgeon@portlaw.com
cblattner@portlaw.com
Troy G. Sexton
tsexton@portlaw.com
Motschenbacher & Blattner, LLP
117 SW Taylor Street, Suite 200
Portland, OR 97204
Telephone: (503) 417-0500
Facsimile: (503) 417-0501

Attorneys for Defendants DAVID STINGL and TONY SIRIANNI

☒ by **CM/ECF**

☐ by **Electronic Mail**

☐ by **US Postal Service**

By /s/ Corey B. Tolliver
Corey B. Tolliver

CERTIFICATE OF SERVICE

FOLAWN ALTERMAN & RICHARDSON LLP
805 SW Broadway, Suite 2750
Portland, OR 97205
Telephone: (503) 517-8200